

Inv# 1308371



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

1-29-04

Time Start

Time Finish

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR☒ S Q GENERATOR

Company name Braeburn Alloy Steel I.D. Number PAD004337903
 Site Address 101 Braeburn Road Lower Merion, PA
 County Westmoreland Municipality Lower Merion Zip 15068
 Name of Inspector Gerald Trupoli
 Name & Title of Responsible Official Dale Hollabaugh maint. mgr.
 Person Interviewed Same Telephone (724) 226-4265
 Mailing Address (if different from above) Same
 Amount of Hazardous Waste Generated per Month: 12 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other
 PBR: ☐ Neutralization/WWTP ☐ Reclaim Other

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types

3. Hazardous Waste Transporters:

Transporter Name Safety Kleen License Number
 Transporter Name License Number
 Transporter Name License Number

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D018/D039	spent naphtha solvent	Safety Kleen, Johnstown Pa.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - SMALL QUANTITY GENERATORS

Site Name Braeburn Alloy Steel Number PA0004337903 Date 1-29-04

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
/	/	/	/	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
/	/	/	/	Identification Number	262a.10	262.12	H002
/	/	/	/	Authorized transporters only	262a.10	262.12(c)	H003
/	/	/	/	Subsequent notification requirements met	262a.12(b)		H004
/	/	/	/	Proper manifest used	262a.10	262.21	H005
/	/	/	/	Manifests filled out correctly and completely	262a.20		H006
/	/	/	/	Manifests signed and routed properly	262a.23(a)	262.23	H007
/	/	/	/	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
/	/	/	/	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
/	/	/	/	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
/	/	/	/	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
/	/	/	/	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
/	/	/	/	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
/	/	/	/	Specified records retained for three years	262a.10	262.40(c)	H014
/	/	/	/	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
/	/	/	/	Exception reporting procedures followed	262a.42	262.42	H016
/	/	/	/	Spill reporting procedures followed	262a.10	262.34(d)	H017
/	/	/	/	PPC plan developed and implemented	262a.10	262.34(a)	H018
/	/	/	/	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
/	/	/	/	Source reduction strategy prepared and available (LQG only)	262a.100		H020
/	/	/	/	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS – SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Braeburn Alloy ID Number PAD 004337903 Date 1-29-04
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
/				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
/				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1-29-04 Identification Number PA0004337903

Company/Facility/Site Name Braeburn Alloy Steel

Observation

A followup inspection was completed for the 3-14-02 inspection. This facility is still listed as a small quantity generator of hazardous waste. The only hazardous waste presently generated is Osher Safety Kleen Premium Gold solvent. Safety Kleen's TCLP analysis dated 1-17-02 reported exceedances of the limits for benzene & tetrachloroethylene in this product. The flash point is in excess of the 140 °F limit.

My 3-14-02 inspection requested analysis of the waste oil and coolant stored in a black tank outside. This is generated from the machining of stainless steel. The analysis of the two phases of this waste stream was completed by Microbac Labs and submitted by US Filter dated 6-19-02. I received a copy of this hazardous waste determination on June 25, 2002. Neither phase was hazardous. No additional violations were identified on this date.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature]

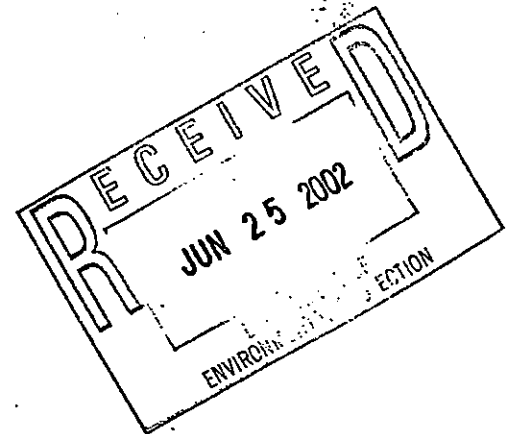
Date 2-3-04

Inspector (signature) [Signature]

Date 2-13-04

June 19, 2002

Mr. Robert A. Lambermont
Supervisor, Engineering and Maintenance
Braeburn Alloy Steel
101 Braeburn Road
Lower Burrell, PA 15068



Subject: Toxicity Characteristic Leaching Procedure Results
Clear Liquid - Black Tank Press

Dear Mr. Lambermont:

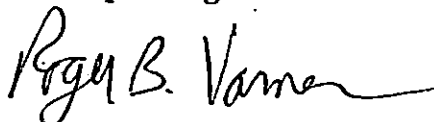
Please find enclosed the Toxicity Characteristic Leaching Procedure (TCLP) analytical results from samples procured on May 20, 2002. Two samples were obtained from the Black Tank from the Press and analyzed for Corrosivity, Ignitability, Reactivity, and TCLP extract for Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, and Silver. A first draw sample was obtained and the second sample was obtained after running the water from the tank to the drain for 15 minutes. Both sample results did not exhibit characteristics of Ignitability, Corrosivity, Reactivity, and the TCLP extract did not exceed the maximum concentration of contaminants for the above metals that were tested.

The actual analytical results from Microbac Laboratories are enclosed along with the Federal EPA Regulations for the Characteristics of Hazardous Waste (40 CFR 261 Subpart C). These results indicate that the water tested is non-hazardous.

As always it has been a pleasure to assist you in environmental testing services. Should you have any questions concerning the enclosure, please contact me at 412-390-5010.

Very truly yours,

USFilter Operating Services


Roger B. Varner
Project Engineer

RBV:rv

enclosure

Note: These samples represent the two phases of the R-509 waste oil & coolant storage tank. G.H.T.

VIVENDI
water company

Microbac

Microbac Laboratories, Inc.

Pittsburgh Division
100 Marshall Drive
Warrendale PA 15086
(724) 772-0610

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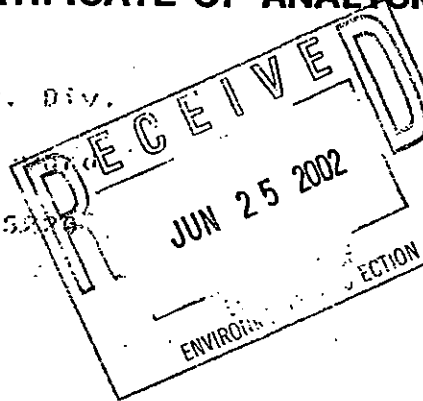
AIR • FUEL • WATER • FOOD • WASTES

CERTIFICATE OF ANALYSIS

U.S. FILTER / SSS Env. Div.
Mr. Roger Varner
921 Saw Mill Run Blvd

Pittsburgh PA 15206

Permit No
Cust. P.O. 1001.02



Date Reported 6/10/02
Date Received 5/28/02
Order No 2041 00742
Invoice No 077207
Cust # RU024
Sampled Date 5/20/02
Sampled Time 13:00

Subject: Braeburn Alloy Wastewater Sample for Analysis

SNP	TEST	METHOD	* DL	RESULT	UNITS	DATE	TECH
1	Clear Liquid Black Tank Press Collected 5/20/02 @ 13:00						
	Corrosivity	SW-846 9040		7.3		5/30/02	DWA
	Ignitability	SW-846 1010		DNF; >200	Degrees F	6/05/02	RDP
	Reactivity					5/31/02	DWA
	Reactive Cyanide	SW-846 7.3.3.2	0.10	<0.10	mg/L	5/31/02	DWA
	Reactive Sulfide	SW-846 7.3.4.2	0.10	<0.10	mg/L	5/31/02	DWA
	TCLP Extract Preparation	SW-836 1311				6/03/02	JGR
2	TCLP of Water						
	TCLP Metals					6/06/02	CNP
	Arsenic	SW-846 60100	0.10	<0.10	mg/L	6/06/02	CNP
	Barium	SW-846 60100	1.0	1.53	mg/L	6/06/02	CNP
	Cadmium	SW-846 60100	0.005	<0.005	mg/L	6/06/02	CNP
	Chromium	SW-846 60100	0.05	0.07	mg/L	6/06/02	CNP
	Lead	SW-846 60100	0.10	<0.10	mg/L	6/06/02	CNP
	Mercury	SW-846 7471	0.002	<0.002	mg/L	6/05/02	JGR
	Selenium	SW-846 60100	0.10	<0.10	mg/L	6/06/02	CNP
	Silver	SW-846 60100	0.05	<0.05	mg/L	6/06/02	CNP
3	Black Tank Press After Running Drain 15 Min. Collected 5/20/02 @ 13:30						
	Corrosivity	SW-846 9040		7.4		5/30/02	DWA
	Ignitability	SW-846 1010		DNF; >200	Degrees F	6/05/02	RDP
	Reactivity					5/31/02	DWA
	Reactive Cyanide	SW-846 7.3.3.2	0.10	<0.10	mg/L	5/31/02	DWA
	Reactive Sulfide	SW-846 7.3.4.2	0.10	<0.10	mg/L	5/31/02	DWA
	TCLP Extract Preparation	SW-836 1311				6/03/02	JGR

Certificate Of Analysis Continued On Next Page

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www.microbac.com

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USDA-EPA-NIOSH Testing Food Sanitation Consulting Chemical and Microbiological Analyses and Research

MEMBER
ACIL

Microbac

Microbac Laboratories, Inc.

Pittsburgh Division
100 Marshall Drive
Warrendale PA 15086
(724)772-0610

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AIR • FUEL • WATER • FOOD • WASTES

CERTIFICATE OF ANALYSIS

U.S. FILTER / SSS Env. Div.
Mr. Roger Varner
921 Saw Mill Run Boulevard

Pittsburgh PA 15220

Date Reported 6/10/02
Date Received 5/28/02
Order No 9043 00748
Invoice No 077202
Cust # BU024
Sampled Date 5/20/02
Sampled Time 13:00

Permit No
Cust P.O. 1001.02

Subject: Braeburn Alloy Wastewater Sample for Analysis

SMP	TEST	METHOD	* DL	RESULT	UNITS	DATE	TECH
4	TCLP of Water / After 15 Min						
	TCLP Metals.						
	Arsenic	SW-846 6010B	0.10	(0.10	mg/l	6/06/02	CHP
	Barium	SW-846 6010B	1.0	(1.0	mg/l	6/06/02	CHP
	Cadmium	SW-846 6010B	0.005	(0.005	mg/l	6/06/02	CHP
	Chromium	SW-846 6010B	0.05	0.06	mg/l	6/06/02	CHP
	Lead	SW-846 6010B	0.10	(0.10	mg/l	6/06/02	CHP
	Mercury	SW-846 7471	0.002	(0.002	mg/l	6/05/02	JGR
	Selenium	SW-846 6010B	0.10	(0.10	mg/l	6/06/02	CHP
	Silver	SW-846 6010B	0.05	(0.05	mg/l	6/06/02	CHP

DNF = Did not flash; did not burn when flame applied.

Approved By Laboratory Director: David J. Jam

* Detection Limit



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USDA-EPA-NIOSH Testing Food Sanitation Consulting Chemical and Microbiological Analyses and Research

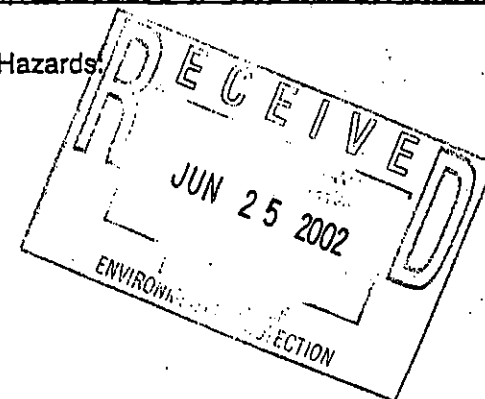
MEMBER

ACIL

P.O. # 1001-02		CLIENT NAME US FILTER OPERATING SERVICES		PROJECT / LOCATION CRABIERN ALLOY STEEL		WATER COMPOSITE SAMPLING DATA							
SAMPLERS (Signature)		SEND REPORT TO: ROGER VARNER		PHONE: (412) 390-5010		_____ AUTOMATIC _____ DISCRETE _____ TIME _____ CONTINUOUS _____ FLOW _____ PROPORTIONED		BEGIN: _____ DATE _____ TIME _____ FLOW _____ INTERVAL _____		END: _____ DATE _____ TIME _____ FLOW _____ MLS / Sample _____		TEMP _____ TOTAL FLOW _____ TECH _____ # samples _____	
MICROBAC DIVISION PGH.		Sample Chest # Chest Temp. _____ °C		Sample Temp. 4 °C		Method of Shipment: COURIER / PICKUP		Date _____		Time _____			
LAB I.D.	SAMPLE NO.	SAMPLE DESCRIPTION / LOCATION		COLLECTED TIME	COMP	SAMPLE TYPE GRAB	MATRIX	NO. OF CONTAINERS	CONTAINER TYPE / PRESERVATIVE	ANALYSES REQUESTED			
9941-748		(CLEAR LIQUID BLACK TANK PRESS		5/20/02 1:00P		✓	WATER	1	AMBER QT - UNPRESERVED				
		WATER SAMPLE FOR TCLP / RCRA											
		BLACK TANK PRESS AFTER RUNNING DRAIN 15 MIN		5/20/02 1:30P		✓	WATER	1	AMBER QT.	CORROSIVITY, IGNITABILITY, REACTIVITY, TCLP EXTRACTION:			
										(8 RCRA METALS: ARSENIC, BARIUM, CADMIUM, CHROMIUM, LEAD, MERCURY, SELENIUM, SILVER			

Relinquished by: (Signature)	1	Date	Time	Received by: (Signature)	2	Date	Time
<i>[Signature]</i>		5/20/02	6:00A	<i>[Signature]</i>		05/20/02	07:30
Relinquished by: (Signature)	3	Date	Time	Received by: (Signature)	4	Date	Time
<i>[Signature]</i>		5/28	1320	<i>[Signature]</i>		5/28/02	1320
Relinquished by: (Signature)		Date	Time	Received by: (Signature)	6	Date	Time
<i>[Signature]</i>		5/28/02	1535	<i>[Signature]</i>			
Relinquished by: (Signature)	7	Date	Time	Received by: (Signature)	8	Date	Time
<i>[Signature]</i>				<i>[Signature]</i>		5/29/02	<i>[Signature]</i>

Comments or Special Hazards:





1107614

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

3-14-02

Time Start

10:15

Time Finish

4:45

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name Braeburn Alloy Steel I.D. Number PAD004337903Site Address 101 Braeburn Road Lower Burrell, PaCounty Westmoreland Municipality Lower Burrell Zip 15068Name of Inspector Gerald S. RussoName & Title of Responsible Official Robert LambermontPerson Interviewed Robert Lambermont & Dale Hollabaugh Telephone (724) 226-4253Mailing Address (if different from above) same. Hollabaugh 724-224-6900 (gen)Amount of Hazardous Waste Generated per Month: 12 Pounds -226-4265

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☒ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Safety Kleen License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D018, D039	spent naptha solvent	Safety Kleen Johnston Pa

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Braeburn Alley ID Number PA0064337803 Date 3-14-02
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
			✓	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
✓				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
✓				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
✓				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
✓				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
✓				Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
✓				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓				Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Braeburn ID Number _____ Date 3-14-02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Braeburn Alloy ID Number PA0004 337803 Date 3-14-02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
/				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
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/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3-14-02 Identification Number PAD004337903Company/Facility/Site Name Braeburn Alloy Steel

A) Observations

On 7-13-00 I requested an analysis of the non hazardous safety Kleen naphtha solvent generated as a waste here. The composite sample of 5 units taken on 1-9-02 identified high levels for benzene and tetrachloroethylene. The generator has not shipped the solvent yet. Since the solvent is still in the bicycle unit it has not yet become a waste. When it is removed the generator plans to handle it as a D018 D039 hazardous waste. A hazardous waste determination submitted to me identifies this. This violation has been corrected.

One additional waste stream, ~~spent~~ waste oil and coolant - R-509 does not have any analysis to show that the stainless steel that is machined here is not hazardous.

B) Violation

1) R-509 waste oil and coolant lacks a chemical analysis and hazardous waste determination for its use on stainless steel. This is required under 40 CFR Section 262.11 as incorporated by reference in 262.9.10.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature]Date 3/14/02Inspector (signature) [Signature]Date 3-14-02

FLX950944



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 7-13-00
Time Start 10:30
Time Finish 1:00

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR☒ S Q GENERATOR

Company name Braeburn Alloy Steel Div of CCX inc I.D. Number PADO04337903
Site Address 101 Braeburn Road, Lower Burrell Pa
County Westmoreland Municipality Lower Burrell Zip 15068
Name of Inspector Gerald Tringali
Name & Title of Responsible Official Robert Lambermont
Person Interviewed Robert Lambermont Telephone (724) 226-4253
Mailing Address (if different from above) Same
Amount of Hazardous Waste Generated per Month: None Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☐ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>Non Haz.</u>	<u>Safety Kleen Premium solvent.</u>	<u>Johnstown, Pa</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Braeburn Alloy Steel ID Number PA0004337903 Date 7-13-00

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
			✓	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
✓				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
✓				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
✓				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
✓				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
✓				Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
✓	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓	✓			Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	✓			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	✓			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Braeburn Alloy Steel ID Number PA000337903 Date 7-13-00

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
	✓			Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
	✓			Containers of hazardous waste in good condition	265a.1	265.171	H026
	✓			Containers and stored waste compatible	265a.1	265.172	H027
	✓			Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
	✓			Containers managed to prevent leaks	265a.1	265.173(b)	H029
	✓			Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
	✓			Container storage areas inspected at least weekly	265a.1	265.174	H031
	✓			Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
	✓			Proper containment and collection systems in place	265a.179		H033
	✓			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
	✓			Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
	✓			Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
	✓			Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 7-13-00 Identification Number PAD004337903

Company/Facility/Site Name Braeburn Alloy Steel

A) Observations

- 1) This facility changed their hazardous waste activities notification form on 12-28-89 from a large to a small quantity generator.
- 2) From 1994 to date Braeburn has used Safety Kleen premium with a 148°F flash point which is claimed to be nonhazardous.
- 3) Manifested shipments of 40 to 80 gal are made about every 2 months to Safety Kleen in Johnstown Pa.
- 4) No analysis was provided by Safety Kleen nor Braeburn to test for TCLP or volatile organic contaminants.
- 5) No other hazardous waste streams are generated at this facility.
- 6) A PPC plan has been completed and updated as recently as 1996.
- 7) Secondary containment is provided for waste oil and is available for drums of hazardous waste, if generated.

B) Violations:

- 1) The Safety Kleen premium solvent has not been analyzed for volatile hazardous waste characteristics. You should provide a determination including analysis, as required by Section 262.11.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 7/13/00

Inspector (signature) [Signature] Date 7-13-00

Hazardous Waste Inspection Report Generators — Part A

Date of inspection 12-14-89 Time start 11:20 Time finish 4:00 PM
Name of inspector Gerald Tricoli
Company, installation name Braeburn Alloy Steel, Div. of CCX, Inc
Location Main Road
County Westinghouse Municipality Lower Burrell
Identification number PAD 004 337903
Name of responsible official Robert Lambermont
Title Mgr. of Maintenance & Engineering
Mailing address River Road & Main Road, Lower Burrell Pa 15068
Area code and telephone number (412) 224-6900
Name of person interviewed Bob Lambermont
Title Same
Mailing address (if different from above) Same
Area code and telephone number

1. Current waste handling method:

- a. ~~On-site~~ ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. 2727 kg./yr. (cleanup only)

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

[illegible]

Hazardous Waste Inspection Report
Generators - Part B

12-14-89

1—No Violation Observed				2—Not Applicable				3—Not Determined				4—Non-Compliance			
Status				REQUIREMENT								Chapter Citation			
1	2	3	4												
✓				Hazardous waste determination, copies available								75.262			
✓				Identification number								(b)			
✓				Hazardous waste shipments offered only to licensed transporters								(c)(1)			
	✓			Hazardous waste shipments offered only to licensed transporters								(c)(4)			
	✓			Authorization received from TSD facility for wastes shipped off-site								(d)			
	✓			PA manifest used for intrastate shipments								(e)(2)			
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments								(e)(3)			
			✓	Manifests filled out properly and completely								(e)(7)			
✓				Manifests routed properly and within time limits (7 days)								(e)(14) or (15)			
✓				Proper U.S. DOT shipping containers or packages								(f)(1)(i)			
✓				Shipping containers marked and labeled according to U.S. DOT								(f)(1)(ii)			
✓				Containers of 110 gal. or less marked with required PA label								(f)(1)(iii)			
✓				Placards offered to transporter								(f)(2)			
✓				Wastes accumulated on-site for less than 90 days								(g)(1)(i)			
			✓	Wastes stored in proper containers and properly marked and labeled								(g)(1)(ii)			
			✓	Containers managed in accordance with 75.265(q)(1)– 14								(g)(1)(iii)			
✓				Containers clearly marked with accumulation date and visible for inspection								(g)(1)(iv)			
				Records retained at designated location for 20 years								(h)			
✓				Quarterly reports submitted to the Department								(i)			
✓				Exception reporting procedures followed								(j)			
	✓			Hazardous waste disposal plan, if required								(l)			
✓				Spill reporting procedures followed								(m)(1)			
✓				Preparedness, Prevention and Contingency Plan and implemented								(m)(5)			
	✓			Special requirements followed for international shipments								(o)			
✓				On the job or classroom personnel training program [75.265(f)]								(g)(1)(6)			
		✓		Drum accumulation area inspected weekly as per 75.265(q)(5)								(g)(1)(iii)			

Hazardous Waste Inspection Report
TSD Facilities - Storage (Containers)*Braeburn Alloy Steel*

12-14-89

1—No Violation Observed

2—Not Applicable

3—Not Determined

4—Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
✓				Containers managed to prevent leaks and spills.	(q)(1), (4)
✓				Containers are compatible with waste stored.	(q)(2)
✓				Containers are closed during storage.	(q)(3)
		✓		Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5)
✓				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q)(6)
✓				Satisfactory procedures followed for handling incompatible wastes.	(q)(7), (8)
✓				Incompatible wastes separated or protected from other materials.	(q)(9)
			✓	Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.	(q)(10)
			✓	Containment system has impervious base free of cracks.	(q)(10)(i)
			✓	Efficient drainage provided from base to sump or collection system.	(q)(10)(ii)
			✓	Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.	(q)(10)(iii)
✓				Run-on into containment system prevented.	(q)(11)
			✓	Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.	(q)(12)
✓				At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.	(q)(13)
	✓			Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤ 6 feet high, 8 ft x 8 ft, 5-foot surrounding aisle space).	(q)(14)(i)
✓				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤ 9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).	(q)(14)(ii)
✓				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.	(q)(14)(ii)
✓				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria (≤ 9 feet high).	(q)(14)(iii)
✓				Containers labeled to accurately identify hazardous waste contained.	Act 97 Section 403(b)(2)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PAD 004 337 903
Company, Installation Name Braeborn Alloy Steel
County Westmoreland Municipality Lower Burrell

A) Observations:

- 1) Baghouse was cleaned up by Petroclean
- 2) A shipment of K061 was made by Petroclean to Michigan Disposal, Inc. on 12-11-89.
- 3) The generators EPA ID No. was incorrectly typed on the manifest.
- 4) Michigan Disposal was notified as of this date.
- 5) An attached sheet notifies that this waste is LDR waste.
- 6) A TCLP analysis for K061 has been completed and indicate that the untreated non-wastewater (low zinc) slightly exceeds the treatability standards.
- 7) A separate letter dated 12-4-89 acknowledges acceptability of this one time shipment of 10 drums for treatment at their Belleville Michigan facility of Michigan Disposal, Inc.
- 8) The electric arc furnace and baghouse have now been eliminated from use.

(cont.)

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Robert J. Frank Date 12/14/89
Inspector (signature) Gerald Trizoli Date 12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PA0004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell.

Observations (cont.)

- 9) One 2-25-87 manifest to Enille, Alabama (CWM) # CWMA 333249 still lacks a signed copy.
- 10) CWM was contacted by phone and requires a written request to find & photocopy the appropriate manifest (signed).
- 11) All of the violations listed on my 7-14-88 N.O.V. letter were reviewed and complied with as follows:
 - a) KO61 dust (10 drums) stored over 90 days, was removed 12-11-89
 - b) KO61 dust was properly containerized, labeled & dated by Petroclean prior to 12-11-89.
 - c) The four unsigned manifest copies have been located and/or photocopied and now are being stored.
 - d) Five quarter reports of hazardous waste activities were received by mail on 9-15-89.
- 12) A small quantity of the waste gasoline solvent remains in one drum.

(cont.)

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Person Interviewed (signature) _____

Inspector (signature) _____

Gerald Myron

Date _____

Date _____

12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell

Observations (cont.)

- 13) This drum has not been labeled with a U.S. D.O.T. "Flammable Liquid" label.
- 14) Gasoline is no longer used as a degreaser. Safety Kleen is being considered as an alternative.
- 15) All of the drums previously noted containing waste oils around the plant have been pumped to a holding tank, tested and hauled by Liquix as a waste oil.
- 16) An extensive number of drums (400-500) have been cleaned up from around the plant.
- 17) The depressed area adjacent to the plant is being regraded. Nearly all of the refractories and clean fill have been covered with soil. A fence is being installed along the far property line near the Village of Braeburn.
- 18) Drums remain to be cleaned out from the far property downstream of the plant in the spring.

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Person Interviewed (signature) _____ Date _____
Inspector (signature) Gerald Myzior Date 12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell

B) Violations:

- 1) The 12-11-89 manifest was not properly completed. The U.S. E.P.A. I.D. No. was not reported correctly. You should contact the TSD facility and advise them that the proper number should be noted on the manifest discrepancy area. You should check each manifest more carefully before shipping.
- 2) One drum containing an ignitable waste lacks a U.S. D.O.T. "Flammable Liquid" label. You should secure the required label on this drum.
- 3) The area where this one drum of spent gasoline degreaser is stored does not meet the hazardous waste container storage requirements for a generator. As a generator, you are required to provide containment in accordance with 28 Pa.C.S. 265 (g) (10-12).

(cont.)

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Person Interviewed (signature) _____

Date _____

Inspector (signature) Gerald OrsoliDate 12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO04337203
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell

C) Comments:

- 1) This facility presently generated no hazardous waste and stores approximately 5-10 gals of a D001 waste in one drum. This facility presently appears to meet the EPA criteria of a small quantity generator and presently has well under 1000 Kg of hazardous waste on site.
- 2) No Landfill Disposal Restriction violations were evident. The "Observations" identify that proper notice has been made for the one shipment of H61.
- 3) The small quantity of D001 awaits ~~disposal~~ approval for disposal or reuse.

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Person Interviewed (signature) Robert A. Gambino Date 12/14/89
Inspector (signature) Gerald Myers Date 12-14-89

FY 1989 HAZARDOUS WASTE COMPLIANCE, MONITORING AND ENFORCEMENT LOG

4. Data Entry...

1. EPA ID: PAD004337903

2. HANDLER NAME: Braeburn Alloy Steel - Dwyer CCK, Inc.

New ☐
Update ☒

3. ADDRESS: River Road & Main Rd. Lower Burrell Pa 15068

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 9/8/89 5a. AGENCY RESPONSIBLE FOR: 5 S = State B = Contractor/State
Put code in box 5 C = Contractor/EPA X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT: Select Evaluation Type and insert in box: 1
1 = Compliance Eval. Inspection (CEI) 4 = Comp GUM Eval (CHE)
2 = Sampling Inspection 5 = Compliance Sched. Eval
3 = Record Review 11 = Case Dev. Inspection
12 = O&M Inspection
13 = CA Oversight Insp.

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 12/14/89

7a. Eval. Comments:

8. S and VIOLATIONS	Class of Violation	Violations							
		GUM	C/PC	Fin. Res	Pt. B	Ompl. Sch	Manifest	Land-Ban	Other
X = Violations, no Specialties			0				0	0	0
B = Violations & Specialty			0				0	0	0
S = Same Viol./Specialty			0				0	0	X
Z = Pending determination									
O = No Viol or Specialty found									
Acceptable Codes									
		X	X	X	X	X	X	X	X
		S	S	S	S	S	S	S	S
I = No-insurance only		Z	Z	Z	Z	Z	Z	Z	Z
C = CA Schedule Violation		O	O	O	O	O	O	O	O
H = HPV		H	H	I*	H	C	H	H	H
				B*		B			
				H		H			

* = Class I only

8a. Comment: container diking

9. ENFORCEMENT ACTIONS:

Class	Area of Viol./rel.	Type (use code)	Date Action			Compliance Dates		Penalty		Resp. Ag.
			Taken	Scheduled	Actual	Scheduled	Actual	Assessed	Collected	
II	Other	10	9-8-89	10-8-89						5
I	C/PC	10	9-8-89	10-8-89	12-14-89					5

Codes for 03 = Warning Letter 11 = Filed Civil Action 15 = CA Init. Admin Order Resp Agcy Codes
Types of 04 = Admin. Complaint 12 = Filed Criminal Action 16 = CA Final Admin Order E = EPA
Enforcement 05 = Final Admin. Order 18 = Civil Referral to AG/DOJ 21 = Notice of Non-comp. S = State
Actions: 10 = Informal 19 = Final Judicial Order 22 = FFCA X = EPA Oversight

10. Enforc. Comment: RCRA closure complete.

1989 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

PA 0004337703

4. Data Entry

HANDLER NAME: Brachman Alloy Steel Products Inc
 ADDRESS: River Road & Main Rd Lower Burrell Pa 15068

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 12/14/89

5a. AGENCY RESPONSIBLE FOR EVALUATION:

Put code in box

5

E = EPA

S = State

C = Contractor/EPA

O = Other

B = Contractor/State

X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:

Select Evaluation Type and insert in box: 1

1 = Compliance Eval. Inspection (CEI) 4 = Comp GWM Eval (CME)

2 = Sampling Inspection

3 = Record Review

5 = Compliance Sched. Eval

11 = Case Dev. Inspection

12 = O&M Inspection

13 = CA Oversight Insp.

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 1/1/

7a. Eval. Comments:

8. ISS and VIOLATIONS

Key:

'X' = Violations, no Specialties

'B' = Violations & Specialty

'S' = Same Viol./Specialty

'Z' = Pending determination

'O' = No Viol or Specialty found

Specialties

'I' = No-insurance only

'C' = CA Schedule Violation

'H' = HPV

* = Class I only

Class of Violation	Violations							
	GWM	C/PC	Fin. Res	Pt. B	Ompl. Sch	Manifest	Land-Ban	Other
I								
II						X	O	X
Acceptable Codes								
	X	X	X	X	X	X	X	X
	S	S	S	S	S	S	S	S
	Z	Z	Z	Z	Z	Z	Z	Z
	O	O	O	O	O	O	O	O
	H	H	I*	H	C	H	H	H
			B*		B			
			H		H			

Comment: manifest ID # error; DOT label missing

ENFORCEMENT ACTIONS:

Class	Area of Viol./rel.	Type (use code)	Date Action Taken	Compliance Dates			Penalty		Resp. Ag. (use code)
				Scheduled	Actual		Assessed	Collected	
II	manifest	CO	12-14-89	12-14-89					S
II	other	CO	12-14-89	1-14-89					S

Codes for 03 = Warning Letter

Types of 04 = Admin. Complaint

Enforcement 05 = Final Admin. Order

Actions: 10 = Informal

Enforc. Comment:

11 = Filed Civil Action

12 = Filed Criminal Action

13 = Civil Referral to AG/DOJ

19 = Final Judicial Order

15 = CA Init. Admin Order

16 = CA Final Admin Order

21 = Notice of Non-comp.

22 = FFCA

23 = Fed. Fac. Referral to HQ

Resp Agcy Codes

E = EPA

S = State

X = EPA Oversight

Date of inspection 3-8-89 Time start 2:00 Time finish 3:00
Name of inspector Gerald Thynor & Gale Campbell
Company, installation name Braeburn Alloy Steel, subs. of CCX, Inc.
Location Main Road
County Westmoreland Municipality Lower Burrell
Identification number PA0004337903
Name of responsible official Robert Lambermont
Title _____
Mailing address Main Road Lower Burrell, Pa 15066
Area code and telephone number (412) 224-6900
Name of person interviewed Robert Lambermont
Title Mgr of Eng & Mnt.
Mailing address (if different from above) Same
Area code and telephone number _____

a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR

b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal

d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

a. none presently kg./mo.

b. _____ kg./yr.

[illegible]

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report Generators — Part B

Brabum

3-8-88

1—No Violation Observed

2—Not Applicable

3—Not Determined

4—Non-Compliance

Status

REQUIREMENT

Chapter
Citation

75.262

Hazardous waste determination, copies available

(b)

Identification number

(c)(1)

Hazardous waste shipments offered only to licensed transporters

(c)(4)

Authorization received from TSD facility for wastes shipped off-site

(d)

PA manifest used for intrastate shipments

(e)(2)

Disposer state manifest or EPA format manifest used for out-of-state shipments

(e)(3)

Manifests filled out properly and completely

(e)(7)

Manifests routed properly and within time limits (7 days)

(e)(14) or (15)

Proper U.S. DOT shipping containers or packages

(f)(1)(i)

Shipping containers marked and labeled according to U.S. DOT

(f)(1)(ii)

Containers of 110 gal. or less marked with required PA label

(f)(1)(iii)

Placards offered to transporter

(f)(2)

✓ Wastes accumulated on-site for less than 90 days

(g)(1)(i)

✓ Wastes stored in proper containers and properly marked and labeled

(g)(1)(ii)

✓ Containers managed in accordance with 75.265(q)(1) — *at 14*

(g)(1)(iii)

✓ Containers clearly marked with accumulation date and visible for inspection

(g)(1)(iv)

✓ Records retained at designated location for 20 years

(h)

✓ Quarterly reports submitted to the Department

(i)

Exception reporting procedures followed

(j)

Hazardous waste disposal plan, if required

(l)

Spill reporting procedures followed

(m)(1)

Preparedness, Prevention and Contingency Plan and implemented

(m)(5)

Special requirements followed for international shipments

(o)

On the job or classroom personnel training program [75.265(f)]

(g)(1)(6)

Drum accumulation area inspected weekly as per 75.265(q)(5)

(g)(1)(iii)

Hazardous Waste Inspection Report
TSD Facilities - Storage (Containers)

3-8-88

1-No Violation Observed

2-Not Applicable

3-Not Determined

4-Non-Compliance

Status

REQUIREMENT

Chapter
Citation

75.265

1	2	3	4	REQUIREMENT	Chapter Citation
			✓	Containers managed to prevent leaks and spills.	(q)(1), (4)
✓				Containers are compatible with waste stored.	(q)(2)
			✓	Containers are closed during storage.	(q)(3)
		✓		Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5)
✓				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q)(6)
✓				Satisfactory procedures followed for handling incompatible wastes.	(q)(7), (8)
				Incompatible wastes separated or protected from other materials.	(q)(9)
			✓	Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.	(q)(10)
			✓	Containment system has impervious base free of cracks.	(q)(10)(i)
			✓	Efficient drainage provided from base to sump or collection system.	(q)(10)(ii)
			✓	Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.	(q)(10)(iii)
			✓	Run-on into containment system prevented.	(q)(11)
			✓	Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.	(q)(12)
			✓	At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.	(q)(13)
✓				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤ 6 feet high, 8 ft x 8 ft, 5-foot surrounding aisle space).	(q)(14)(i)
✓				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤ 9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).	(q)(14)(ii)
✓				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.	(q)(14)(iii)
✓				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria (≤ 9 feet high).	(q)(14)(iii)
			✓	Containers labeled to accurately identify hazardous waste contained.	Act 97 Section 403(b)(2)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 3-8-89 Identification Number PAD004337903
Company, Installation Name Brachum
County Westmoreland Municipality Lower Burrell

A) Observations

- 1) Gail Campbell Fred Nethercia and I met with Bob Lambermont
- 2) Weather was warm and sunny
- 3) All hazardous waste generation has been discontinued
- 4) This operation consists primarily of pressing other companies' billets.
- 5) The plant is being dismantled in most other areas.
- 6) The electric arc furnace dust bin and baghouse remain and have not been cleaned out yet. Approximately 1 yd.³ of dust remains in the dust bin in the shed. All dust should be removed for proper disposal and is well over 90 days storage.
- 7) This bin is not constructed to meet D.A.T. standards, is not marked or dated and is not routinely inspected.
- 8) The shed over the bin does not meet the

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

(Cont)

Person Interviewed (signature) _____ Date _____
Inspector (signature) Donald Aragon Date 3-15-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 3-8-89 Identification Number PA0004337803
 Company, Installation Name Brachman Alloy Steel
 County Westmoreland Municipality Lower Merion

Observations (Cont)

8) (Cont) container storage requirements of 25.265(g)(10)-(12)

9) The manifest copies have still not been provided.
 B) Violations of 6-24-88 rules.

1) K061 baghouse dust remains on site in the bagger and the baghouse. You should clean out this baghouse and properly dispose of all dust in accordance with applicable regulations.

2) The baghouse bin does not meet DOT standards required to store a hazardous waste. You should clean up all baghouse dust and store it in closed drums, mark, label and date them as required in 25.262(g)(1).

3) Dec 10, 1988 changes in regs now require that any subsequent storage of hazardous waste requires prior construction of an impervious containment for all containers of hazardous waste.

4) The missing manifests, identified on (6)

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Date _____

Gerald Szor

3-15-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection

3-8-89

Identification Number

PAD 004337903

Company, Installation Name

Braeburn Alloy Steel

County

Westmoreland

Municipality

Lower Burrell.

Violations (cont.)

- 4) (cont.) the 6-24-88 inspection have not been found or copied. You should secure and maintain signed copies of these 4 manifests and all manifests for 20 years.
- 5) Until you complete the cleanup of all hazardous wastes and renotify as a small quantity generator or non-generator, you should continue to submit quarterly reports to the Dept. You should submit all missing quarterly reports for the last 7 quarters. (See enclosed sheet.)
- 6) Effective Dec. 10, 1988, all generators of hazardous waste are required to provide single-use containers for all containers of hazardous waste. The present bin used to store the dust does not meet these requirements. If you renotify as a non-generator or SQG this will no longer be required.

C Comments: Call as soon as all violations have been corrected.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

mailed

Date

3-15-89

Inspector (signature)

Gerald Dwyer

Date

3-15-89



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

ENVIRONMENTAL PROTECTION
Bureau of Waste Management
Armbrust Professional Center

R. D. 2, Box 603-C
Greensburg, Pennsylvania 15601

(412) 925-8115

July 14, 1988

CERTIFIED MAIL NO. P. 799 280 066

Braeburn Alloy Steel, Subsidiary of CCX, Inc.
Main Road
Lower Burrell, PA 15068

ATTENTION: Robert Lambermont

Re: RCRA Inspection
EPA ID No. PAD 004337903
Lower Burrell City
Westmoreland County

NOTICE OF VIOLATION

Dear Mr. Lambermont:

A Resource Conservation and Recovery Act (RCRA) inspection of the subject facility was made on June 24, 1988. Pennsylvania Department of Environmental Resources is enforcing the requirements of this Act for the U.S.E.P.A. in Pennsylvania through an agreement with the EPA. Regulations which are equal to or more stringent than EPA's have been passed by Pennsylvania and are found in Act 97 "Pennsylvania Solid Waste Management Act," the Act of July 7, 1980, PL 380 No. 99, 35 P.S. §6018.101 et seq and Chapter 75 "Solid Waste Management Rules and Regulations" SECS 75.260-75.265. This letter is to notify you of the violations that were noted at the time of the inspection.

1. Bag house dust (K061) was stored on-site from June 23, 1987 to December 10, 1987. Additionally, from December 10, 1987 to June 24, 1988 approximately one cubic yard of bag house dust remained in the dust collection box. You should transport all hazardous waste within ninety (90) of the accumulation date. Any additional dust stored inside the bag house or spilled on the ground should also be cleaned up and properly disposed at this time. This is a violation of Section 75.262(g)(1)(i)(2).
2. The bag house dust (K061) should be stored in DOT approved containers. They should be properly identified and dated. Any drums or other containers should be properly sealed to prevent spillage or leakage. Hazardous waste storage containers should be inspected weekly to verify the condition of the containers in the storage area. This is a violation of Section 75.262(g)(1)(ii),(iv) and also Section 75.265(q)(3),(5).

July 14, 1988

Braeburn
Subsidiary

3. Several manifests were not available during this inspection to verify delivery of the hazardous waste to the treatment storage or disposal facilities. If you cannot find the (TSD) signed copies of the following manifests, then you should file an exception with Harrisburg to document all steps taken to verify the proper receipt and disposal. Please document the disposition of the following manifests:

- (a) Manifest document numbers PAB2403774 and PAB0046513 to Mill Service Inc.
- (b) Manifest document number MI0888702 transported by Metropolitan Environmental to Michigan Disposal Inc.
- (c) Manifest document number CWMA333250 transported by Ecology Chemical to Chemical Waste Management.

You should submit photocopies of all misplaced manifests to this office. You should store all manifests, quarterly reports, and exception reports for a period of twenty (20) years from the date generated. These are violations of Section 75.262(h)(1),(2) and Section 75.262(j)(2).

4. As of June 24, 1988, five (5) hazardous waste quarterly reports were overdue. You should properly complete quarterly report (Form 55) and submit to Harrisburg for all of the previous five (5) quarters along with a cover letter that clarifies the late delivery. This is a violation of Section 75.262(i)(1)(ii).

A reinspection of the facility will be conducted on or about August 15, 1988, to determine if the above listed items have been corrected. Failure to comply could result in legal action being taken against you. Penalties for violations can be assessed from \$2,500 to \$100,000 per day.

Failure to abate this violation may result in legal action being initiated against you.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore to hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

1988

Braeburn Alloy Steel
Subsidiary of CCX, Inc.

-3-

July 14, 1988

If you have any questions, contact me at the above number.

Sincerely,



Gerald Tripoli
Solid Waste Specialist

GT/jao

cc: Central Office
Chron
EPA
Regional
Westmoreland County File